

EXHIBIT C

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SUSIE ABRAM,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, DEPARTMENT
OF PUBLIC HEALTH; WILLIAM
FRAZIER, DIRECTOR OF
THERAPEUTIC ACTIVITIES, LAGUNA
HONDA HOSPITAL,

Defendants.

Case No. C07-3006 PJH

PLAINTIFF'S ANSWERS TO
DEFENDANT'S FIRST SET
OF SPECIAL INTERROGATORIES

Plaintiff, Susie Abram, hereby responds to Defendant's First Set of Interrogatories, under oath, as follows:

INTERROGATORY NO. 1:

Do YOU contend that DEFENDANT had any policy, practice or custom that caused any injury that YOU are claiming in this action?

ANSWER TO INTERROGATORY NO. 1:

Yes.

1 INTERROGATORY NO. 2:

2 If YOUR answer to Interrogatory No. 1 is in the affirmative, IDENTIFY the precise
3 written or unwritten policy(ies), practice(s) or custom(s) that YOU contend caused any injury to
4 YOU.

5 ANSWER TO INTERROGATORY NO. 2:

6 A continuing practice of unlawful discriminatory employment actions, retaliation for
7 protesting said actions and harassment

8 INTERROGATORY NO. 3:

9 With respect to each policy, practice, or custom identified in response to Interrogatory 2,
10 DESCRIBE in detail the manner in which the policy, practice or custom caused YOU injury.

11 ANSWER TO INTERROGATORY NO. 3:

12 Said practices have caused and continue to cause me severe emotional distress and
13 compelled me to quit my employment in order to protect my sanity. As a further result of said
14 practices, I have lost and continue to lose substantial earnings, related employment benefits, and
15 other employment opportunities.

16 INTERROGATORY NO. 4:

17 With respect to each policy, practice, or custom identified in response to Interrogatory 2,
18 state the date on which the policy, practice, or custom commenced.

19 ANSWER TO INTERROGATORY NO. 4:

20 Said practice has been continuous during my supervision by Defendant William Frazier.

21 INTERROGATORY NO. 5:

22 With respect to each policy, practice, or custom identified in response to Interrogatory 2,
23 IDENTIFY the INDIVIDUAL(S) with final policy-making authority for such policy, practice, or
24 custom.

25 ANSWER TO INTERROGATORY NO. 5

26 Defendant William Frazier.

1 INTERROGATORY NO. 6:

2 Do YOU contend that DEFENDANT had actual or constructive knowledge of any of the
3 policy(ies), practice(s) or custom(s) identified in response to Interrogatory No. 2.

4 ANSWER TO INTERROGATORY NO. 6:

5 Yes.

6 INTERROGATORY NO. 7:

7 If YOU answered Interrogatory No 6 in the affirmative, state all facts upon which YOU
8 base YOUR answer.

9 ANSWER TO INTERROGATORY NO. 7:

10 My continuing complaints of such policies, practices or customs.

11 INTERROGATORY NO. 8:

12 Do YOU contend that DEFENDANT approved or ratified any of the policy(ies),
13 practice(s), custom(s) identified in response to Interrogatory No. 2.

14 ANSWER TO INTERROGATORY NO. 8:

15 Yes.

16 INTERROGATORY NO. 9:

17 If YOU answered Interrogatory No. 8 in the affirmative, state all facts upon which YOU
18 base YOUR answer.

19 ANSWER TO INTERROGATORY NO. 9:

20 Notwithstanding knowledge of such practices, policies and customs, as complained of,
21 Defendants continued to engage in and allow such actions, failing to correct same.

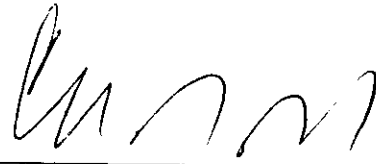
22 INTERROGATORY NO. 10:

23 DESCRIBE the manner in which each policy, practice or custom identified in response to
24 Interrogatory No. 2 deprived YOU of any rights including those identified in the COMPLAINT.

25 ANSWER TO INTERROGATORY NO. 10:

26 See answers to Interrogatories No. 1 through 9 above.

1 Dated: October 11, 2007



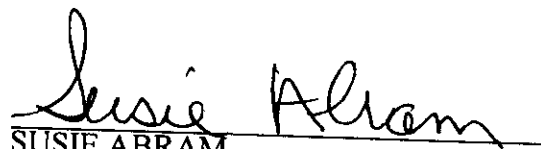
CURTIS G. OLER
Attorney for Plaintiff

VERIFICATION

I, SUSIE ABRAM, declare:

I have read the foregoing Plaintiff's Response to Defendant's First Set of Special Interrogatories, and know the contents thereof. The same is true of my own knowledge, except for those matters stated therein on information and belief, and as to those, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on October 11, 2007, at San Francisco, California.


SUSIE ABRAM

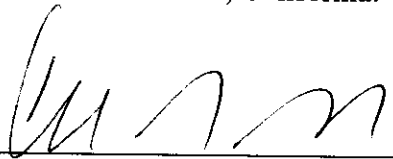
CERTIFICATE OF SERVICE

I, CURTIS G. OLER, am over the age of 18 years and am not a party to the within action. My mailing address is Post Office Box 15083, San Francisco, California.

On October 11, 2007, I served the attached
Plaintiff's Answers to Defendants' First Set of Interrogatories
by hand delivery, sealed in an envelope and addressed as follows:

Jonathan C. Rolnick, Esq.
Deputy City Attorney
1390 Market Street, Sixth Floor
San Francisco, California 94102

I declare under penalty of perjury that the foregoing is true and correct and that this Certificate of Service was executed on October 11, 2007, at San Francisco, California.



CURTIS G. OLER